

Little Traverse Bay Bands of Odawa Indians  
Title IV-B Child and Family Services Plan  
Annual Progress and Service Report for 2011

Subpart I: Stephanie Tubbs Jones Child Welfare Services  
Subpart II: Promoting Safe and Stable Families

Submitted by  
The Little Traverse Bay Bands of Odawa Indians  
Social Service Program  
7500 Odawa Circle  
Petoskey, MI 49770

Human Services Director  
Denneen Smith  
Phone: (231) 242-1620  
Fax: (231) 242-1635

**Little Traverse Bay Bands of Odawa Indians  
APSR for FY 2012-2013  
Table of Contents**

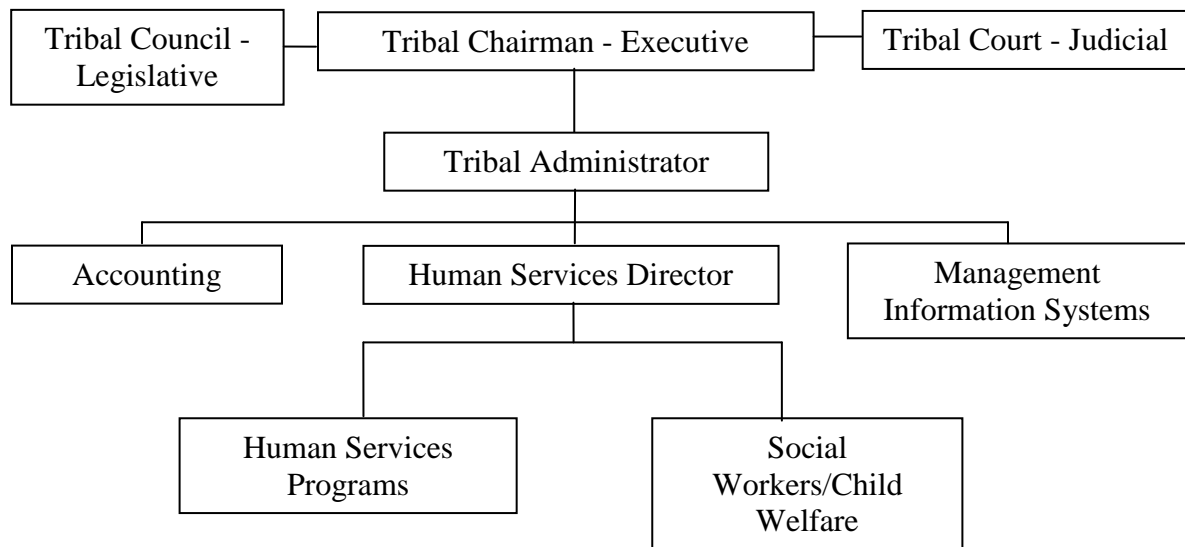
|  |                     |
|--|---------------------|
| <b>Introduction</b>                      | <b>Page 3</b>       |
| <b>Service Description</b>               | <b>3</b>            |
| <b>Vision Statement</b>                  | <b>6</b>            |
| <b>Goals and Objectives</b>              | <b>7</b>            |
| <b>Collaboration</b>                     | <b>11</b>           |
| <b>Program Support</b>                   | <b>15</b>           |
| <b>Consultation with States</b>          | <b>16</b>           |
| <b>Health Care Services</b>              | <b>18</b>           |
| <b>Disaster Plan</b>                     | <b>20</b>           |
| <b>Plan Availability</b>                 | <b>23</b>           |
| <b>Chafee and ETV Programs</b>           | <b>23</b>           |
| <br>                                     |                     |
| <b>Certification of Population Count</b> | <b>Attachment 1</b> |
| <b>Assurances/CFS Forms</b>              | <b>Attachment 2</b> |
| <b>LTBB Emergency Response Plan</b>      | <b>Attachment 3</b> |
| <b>APSR Tribal Checklist for FY 2012</b> | <b>Attachment 4</b> |

## Introduction

The Little Traverse Bay Bands of Odawa Indians (LTBB) was reaffirmed in 1994 as a federally recognized Indian Tribe in the state of Michigan. The Tribe operates from a constitution that was ratified in 2003. The constitution provides the avenue for tribal member's rights, territory, jurisdiction and service area, membership, organization of the government, tribal council, branches of government and sovereign immunity. The LTBB Constitution establishes three distinct branches of government: Legislative, Judicial and Executive. The LTBB Social Services Program is a department within the Executive Branch of the LTBB government structure that was recently merged with the Human Services Department to make up one larger department. The LTBB Social Services Director became the overall department director at the beginning of January 2010. The new title is Human Services Director and this position administers the Title IV-B program under this plan. The Director reports directly to the Tribal Administrator, who reports to the Tribal Chairman.

The LTBB Human Services is composed of seven full time staff members who work to support the mission of the program through various activities that promote safe and stable families. Previously, there were eight full time staff, but one social worker was laid off as a cost saving measure due to the decline of case numbers. The organizational chart below depicts the relationships described above.

### LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS EXECUTIVE BRANCH



## Service Description

Since reaffirmation, the LTBB Human Services Department has evolved from a one person program that monitored Indian Child Welfare Act compliance to a multi-person program that offers services to its membership. This department serves Native Americans throughout the state of Michigan and tribal members throughout the Nation. For the purpose of Title IV-B services, this department serves tribal members within the 27 county service area (Delta, Alger, Alpena, Alcona, Schoolcraft, Luce, Mackinac,

Chippewa, Charlevoix, Emmet, Cheboygan, Presque Isle, Antrim, Leelanau, Otsego, Montmorency, Benzie, Grand Traverse, Kalkaska, Crawford, Osceola, Manistee, Iosco, Wexford, Missaukee, Roscommon and Ogemaw). This program monitors cases with regard to the Indian Child Welfare Act (ICWA) and compliance for Native Americans who are members or eligible for membership within the United States. The majority of monitoring for ICWA cases occurs in Michigan, Minnesota and Wisconsin, with some cases the Tribe has monitored in Arkansas, California and Arizona. The child welfare program and services have far reaching implications both geographically and socially.

The Little Traverse Bay Bands of Odawa Indians Human Services Department is committed to promoting safe and stable families and providing child welfare services. For the purpose of child welfare, the program focuses on three priority areas; protective services, foster care, and adoption and family preservation (formerly known as prevention). It is the goal of the LTBB Human Services Department to address the following in dealing with children and families:

- Safety of children;
- Permanency for children;
- Well-being of children and their families; and
- Quality of services provided to children and families.

There are three main areas in which the LTBB Human Services Department works to address these areas of concern: Protective Services, Foster Care/Adoption and Family Preservation. Title IV-B funds provide a small portion of the staff salaries and benefits for the protection of children, including the following:

1. Protective Services. The Tribe currently employs two full time social workers to address needs in investigating protective services referrals. These workers develop and implement case service plans to minimize and eliminate risk of harm to children. Tribal social workers work collectively with state social workers through the Michigan Department of Human Services to investigate protective services referrals and monitor case service plans. Tribal Social Services is solely responsible for protective services cases that occur on tribal land. This promotes safety of children, well-being for families and permanency for families. Approximately 50-75 families are referred for investigation annually. During the reporting period (October 2010-May 2011) there were 56 cases investigated for protective services.
2. Foster Care/Adoption. The LTBB Human Services Department oversees foster care and adoption for children under the jurisdiction of the LTBB Tribal Court. Social workers develop and implement case service plans to reunify families as well as assist with adjustment of placement changes. This department is responsible for completing home studies for the purpose of presenting information to the LTBB Child Welfare Commission to recommend the licensing of foster homes. The LTBB Child Welfare Commission licenses homes for the purpose of providing foster care. Further, it is with the foster care services that

CHAFEE and Educational Training Voucher referrals are made so that Tribal children have access to these services through a collaborative effort through the State of Michigan. This promotes safety of children, permanency for children, well-being for families and quality of service. During this reporting period (Oct 2010-May 2011) 28 children received foster care or adoption services.

3. Family Preservation (formerly known as Prevention). The name of this program was changed to better reflect the goal. This department is committed to helping those who want or need extra help. Our social workers work to keep families together by linking them to services and resources within the Tribal and local community. It is with the Family Preservation program that out of home placement of children is prevented, thus preserving the family unit. The Tribe employs active efforts in preventing the break up of families. These active efforts go above and beyond reasonable efforts. These efforts are seen as exhaustive. This promotes safety of children, permanency for children, well-being for families and children and quality of service for families. During this reporting period (Oct 2010-May 2011) 95 people were assisted for this purpose.

Title IV-B Subpart 1 and Subpart 2 funds are used to provide court-ordered assessments, direct client services, travel and training to support staff in carrying out protective services, foster care, and prevention. This occurs through child welfare services via staff for oversight for foster care and adoption; court ordered assessments; training and direct client services. Promoting safe and stable families happens through direct client services, staff salaries, other assessments (psychological, sex offender risk, etc.), travel and training.

The Tribe has adopted its own laws in providing for the protection of children. The law that governs this program is Waganakising Odawak Statute 2009-004 Child Protection Statute. This statute provides all of the information of child protection including: purpose of statute, definitions, jurisdiction, transfer of jurisdiction, procedures, roles of staff and personnel, duty to report child abuse and neglect, child protective investigations and emergency removal, notice, time frames for hearings, delegations of parental authority, filing petitions, hearing types and burden of proof, permanency planning, emergency medical treatment, emancipation, termination of parental rights, adoption, maintenance of child protection records, re-hearings and appeals. There are times when the law as it is written is not comprehensive. In these cases, the Human Services Department or the Tribal Prosecuting Officer has submitted requests to the Tribe's legal department responsible for providing clarification and updates on the Child Protection Code. The legal department issued clarification of the law. Tribal government can be a very fluid and ever changing system. In the past few months, the Tribal Council has moved the legal department from being under the executive branch to the legislative branch. This will limit the interaction on legal issues.

Two years ago, a data collection system was developed and a pilot system was implemented. The LTBB Human Services Department has been working with the data technician/programmer to fine tune the data system and its capability. As a result of

newer versions being implemented, old computer data has been lost. However, it is anticipated that the current data system will sustain the Department for years to come.

LTBB Human Services has been historically audited by the Bureau of Indian Affairs. The Bureau has mandates that are outlined in 25 CFR that indicate how child welfare case files are to be handled. It further outlines payment for placement and necessary documentation to be maintained. Currently, case files are up to date and are in compliance with the standards as set in 25 CFR. However it has been determined that LTBB Human Services no longer receives 638 dollars or funding directly from BIA for services, which means that LTBB Human Services is no longer subject to audits by BIA. The Little Traverse Bay Bands of Odawa Indians Human Services Department is funded through the Tribes general fund and through various grants like Title IV-B. The LTBB Human Services Department will continue to work with Inter-Tribal Council of Michigan who is ultimately responsible for case information to the BIA. Human Services Directors are mandated to review case files for compliance every ninety days. Copies of entire files are maintained at the Inter-Tribal Council Office in Sault Saint Marie, MI because payment for placement of children who are in foster care occurs through there. The payment is half from the Bureau of Indian Affairs funding and half is from the state's Child Care Fund grant. Payment for placement still occurs through this avenue when a child is found to be Title IV-E ineligible. Title IV-E eligibility continues to be determined collectively through the local DHS office and the Tribal Human Services Director.

### **Vision Statement**

The Little Traverse Bay Bands of Odawa Indians Human Services Department is committed to promoting the safety and wellbeing of tribal children, Elders and vulnerable adults and their families by providing a holistic approach that respects the individual and his or her personal, traditional, cultural and spiritual values. The entire Human Services Department staff builds upon these values to empower, strengthen and support Anishnaabek individuals and families toward self-sufficiency. Further, it is the desire of this program and staff to provide a more coordinated service delivery system in the 27 county service area.

As previously indicated, this program has evolved from a program of one person monitoring ICWA compliance through state cases to a four person staff that still monitors ICWA compliance but also provides direct client services in investigating protective service matters, placing and monitoring foster care cases and adoption and providing prevention services. It is through the funding of Title IV-B that this department has evolved and grown. It is with the assistance of IV-B monies and its requirements that this Department has implemented the data base system, regular and ongoing training, and the recruitment of foster and adoptive homes. In order to keep children safe, it is imperative for programs to be able to monitor what is working toward that end and what is not. As stated in the five year plan, focus and enhancement will be given to evidence based practice areas that are succeeding and things that are not working will be eliminated.

## **Goals and Objectives**

The following goals and objectives were identified for the LTBB Human Services Title IV-B program and have enhanced the ability to promote safety and well-being of tribal children by operating integrated, preventative family preservation services and community based family support services for families at risk and in crisis. Data collection and management is crucial in order to accurately identify the clients that we are working with and monitor goals and compliance with funding source requirements. Data collection allows the department to identify the client base and also allow reference to open, closed and pending cases as well as accurately define case type.

Quick reference allows the program to make referrals in a timely fashion, assign cases for investigation quickly and consistently and allow basic case status information to be accessed. This data promotes safety for children through knowledge of the case and services provided.

### **Goal 1. Utilize a Data Collection And Management System**

The LTBB Human Services developed a data management system and began entering referrals into a database in August 2009. The creation of this database provided the program a method of managing data electronically; up until that point, records were only kept on paper and the staff members did not use standard data collection forms. LTBB staff is still in the process of manipulating the database in order for it to work more efficiently and effectively. Continuous program evaluation is necessary in protecting children to allow the program to analyze trends and case time frames. It continues to be the desire of the program to allow a staff person accessing the database to see the case from the start through to present day activity. This is necessary to provide standard continuity of care in dealing with different workers and to identify program strengths and weaknesses. Further, it is necessary so that the program can determine if prevention services are helpful in preventing removal or allows for quicker return of the children. The Human Services Director requested and was granted the assistance of the National Resource Center for Data and Technology to review the data system and make suggestions for changes to enhance the collection and management of the data. Cheryl Montoya spent a few days with the LTBB Human Services staff thoroughly going through the data base and documenting suggested changes. Ms. Montoya then generated a report that the director was able to present to the data programmer / developer to implement. These changes were implemented in December 2010. All of the bugs were worked out and the system has just been re-introduced to staff in May 2011. All of the previous data that was recorded in the system was not able to transfer to the new system. Therefore, the department is essentially starting over with the implementation phase.

Objective 1.1: Establish baseline data to monitor program effectiveness. Target date: December 1, 2009.

Data was entered into the pilot database that included basic demographic data and identifying information, child protective services referrals, case status (open, closed or

pending), case type (PS, foster care/adoption or prevention), case open/closed dates, case outcomes, location of biological parents and placement information. Referral forms, release of information forms, and other necessary information are also options within the database.

Measure: One full quarter (3 months – July, August, September 2009) of data will be provided through the database reports. These reports will allow us to measure achievement of the other goals for the Social Services program, and to identify program services that need to be improved. This goal was partially met. Very general reports are printed from the system. These reports however, did not allow the ability to measure achievement of goals or program services that need to be improved. After meeting with the NRC for Data and Technology, changes were made to the system at the end of 2010. The bugs were just finally worked out and there is system that is being re-implemented as of May 2010.

Measure: Social Services personnel will analyze the information for statistical accuracy and create a “baseline data chart” of significant data; this data will be used to improve outcome reporting and program evaluation and will be used to create charts and graphs to track monthly data. This goal was partially met. Data was entered into the system appropriately. Charts and graphs were not formulated at this point. Due to the data not being able to transfer from the previous version of the data system as well as the previous system not having the capacity to complete this process, this is still a goal that needs to be completed. It is anticipated that this will occur by September of 2011.

Objective 1.2: Automate the data management and analysis process, including generation of reports. Target date: March 1, 2010.

Measurement: The data management system will be enhanced to allow Social Services workers to automate the data entry, data storage, generating reports and data analysis processes to the greatest extent feasible. This will help the program maintain accurate data more efficiently. Automation will improve accuracy of basic client information and other necessary requirements for BIA compliance of Child Welfare cases. It will improve the ability to track referrals and outcomes and will improve the continuity of care provided by workers. Data entry will occur by those trained on the data management system including social workers, administrative assistant and the director. Each person will be trained on the information to be entered and how it should be entered. This data will allow for more timely referrals to services that need to be accessed by the clients by not duplicating the completion of forms when multiple services are necessary. Cutting down on the amount of paperwork will allow caseworkers to spend more time providing direct client services that keep children safe and families stable and less time maintaining files. Further, this information and data entry is necessary for the continued development of the program toward reporting requirements for AFCARS and quality assurance. This objective was partially met. Data is accurately and appropriately entered into the system. However, the previous system did not allow for the transfer of data to the current system. Now that the data system is more advanced, this will be easier to accomplish. It was helpful for fresh eyes to view the data system and offer feedback. After submitting the necessary documented changes to the database developer/programmer, the system is far more user friendly and makes sense in navigating.



## **Goal 2. Protect Children from Abuse and Neglect**

Objective 2.1: Insure that employees are properly trained on the LTBB Child Protection Statute that was implemented in April 2009 by implementing an annual review of the LTBB Child Protection Statute with the LTBB Legal Department and LTBB Prosecutor. Laws change frequently and there will be staff turnover, so we will have to provide refresher training on an ongoing basis. As previously indicated, the Tribe creates its own laws through its Tribal Council. Sometimes change in laws is precipitated by politics and sometimes it is precipitated by need. The Tribal statute outlines time frames, roles and responsibilities, jurisdiction, procedures, hearings, termination, permanency, etc. Having staff properly trained in the law will keep children safe, provide for permanency and focus on the well-being of children and their families, which is our ultimate purpose for the LTBB Human Services Department-Social Services program. Due to the modification of laws and staff turnover, training is necessary. The department has been able to implement annual training of the LTBB Child Protection Law. Staff training on the law provides better protection for children. Target date: the review will be held by February 1 of each year.

Measurement: The number of staff that participate in the annual review as documented on attendance sign in sheets will increase from 0% (0 of 4 employees) currently (the annual review is a new activity) to 100% of staff (4 of 4 employees) trained annually. All social workers and administrative staff have been trained in the LTBB Child Protection Code. This training occurred in January of 2011.

Objective 2.2: Input referral information into database as a method of completing intake for the purpose of assigning referral to caseworker and providing a method of accurate data management. Target date: ongoing as calls are received.

Measurement: A pilot database is being used, with some essential features just recently available. Only 24 referrals were entered electronically in FY 2008. The Social Services program estimates there were 120 total referrals during this time period (only 20% of referrals were documented). The desired outcome is to increase the percent of referrals entered electronically to 100% by January 1, 2014. All first time referrals are entered into the system. The data system currently accommodates multiple child protection referrals.

Measurement: The Human Services Director and the Administrative Assistant will review the referrals semiannually to assure that referral information is up to date and accurately tagged as open, closed or pending. Desired outcome is for 85% of referrals to be entered accurately in FY 2012 with 95% accuracy in FY 2014 as documented on data trackers. Data that was previously entered was found to be correct. However, now that a new version of the data system has been implemented, data will need to be re-entered. Continued monitoring will occur through spot checks.

### **Goal 3. Develop and Implement Foster Home Licensing Regulations, Training and Recruitment Program**

Objective 3.1: Develop and implement comprehensive foster home licensing regulations. The LTBB Human Services staff will work with the LTBB Child Welfare Commission to institute more comprehensive regulations for the licensing, review and revocation of foster home licenses. The regulations will outline specifics with regard to background checks and standards, home requirements, and revocation of licenses process. Regulations will be very clear and concise. Target date: June 2011.

Measurement: Minutes of Tribal Council meeting showing approval of the regulations; implemented and working regulations regarding licensing, review and revocation of foster homes. The desired outcome is for 100% of licensed homes will be in compliance with the new regulations. Regulations were developed and implemented by the Child Welfare Commission at the end of 2009 with input from this program. The regulations were approved by Tribal Council. These regulations are followed 100% of the time in all foster home licensing. These regulations are seen as the final work product, however, there may need to be modification as the program continues to grow.

Objective 3.2: Develop and implement training program for foster care providers. The LTBB Human Services staff will develop and implement a training program for licensed or those desiring to be licensed for the purpose of foster care. This will include training on education training voucher referrals and independent living skill implementation. The training will be developed by the Human Services Department. The training will consist of setting limits, assisting with adjustment, issues that foster children face, visitation and foster parenting requirements.

Measurement: A training program will be implemented for foster parents or those desiring to be licensed foster parents, documented by workshop agendas and sign in sheets. The desired outcome is for 100% of foster parents to participate in the training by September 30, 2014.

Training information has been researched and has been compiled. There are plans to develop a standardized curriculum and implement it. The Department did hold its first mandatory training for licensed foster homes in January 2011. It was attended by all of the licensed homes. The training was about licensing regulations and annual reviews.

Objective 3.3: Develop and implement recruitment program for foster homes. The LTBB Human Services staff will develop and implement a program for the purpose of recruiting tribal citizens to be licensed for foster care through the Tribe.

Measurement: Semiannual mailings and an advertising campaign will be conducted to encourage citizens to become licensed foster parents. Advertising campaigns have been developed and implemented. Post card mailings have gone out. Advertisements were placed in the Odawa Trails Newsletter. Folks who inquire are often deterred when asked to undergo a background investigation. Also, folks have been deterred from following through with licensing because they do not have health insurance and cannot afford the necessary physical. LTBB Human Services has been hesitant in funding these physicals because they are concerned that if the family cannot save enough

money for a physical appointment, they may not be financially stable enough to offer a home to a child in need of care. The Department also held a traditional feast to honor current foster parents and recruit future families. The feast was cooked by the Department staff. A local drum was present to sing honor songs and there was a giveaway as is customary with a traditional feast.

#### **Goal 4. Expand Prevention Services for the Preservation of Families and Promotion of Safe and Stable Families**

Objective 4.1: Provide intervention and active efforts as preventative efforts to reduce the number of out of home placements for children.

Voluntary prevention services will be provided to families who have been referred due to a protective services complaint or other referral. These prevention services provide assistance to tribal members to improve family stability and keep families together. To date, the prevention program has helped families with vehicle repairs, paid for gas to make it possible for family and counseling visits, assisted with lice treatments for families with chronic lice problems, assisted with daily living needs like deodorant, laundry soap, over the counter medications, diapers, underwear and socks for children in emergency removals, and other hygiene products for both men and women. These examples demonstrate how this program promotes safe and stable families and child welfare services.

Measurement: 95 out of 95 (100%) prevention service requests were provided in FY 2010. It is the goal of the program to accurately track referrals and their outcomes to determine an appropriate and accurate percentage of those receiving services. As the data collection system is refined and matures, the program will have a more accurate measure of services provided versus how many were referred or requested. Percentages may need to be adjusted as accurate analysis of the data occurs. This information should be adequately addressed with the new version of the data base system.

#### **Collaboration**

It is the policy and belief of the Little Traverse Bay Bands of Odawa Indians Human Services Department to work for the benefit of children through coordination and consultation with ALL appropriate stakeholders. This includes those at the local level, primarily in day to day operations. The Human Services Department consistently consults with the following for the purpose of *gaining insight, making referrals and providing education*: families, youth, State of Michigan and other various states where tribal members are involved in the child welfare system, Medicaid, Child Care Grant holders, Head Start, commodities, substance abuse programs, in-patient substance abuse and mental health treatment programs, local schools including alternative school programs, MI Works, private foster home licensing agencies, local homeless shelters, the Women's Resource Center domestic violence program, Social Security Administration, local court system, Bureau of Indian Affairs, Inter-Tribal Council of

Michigan and other child placing agencies, local courts, other social services departments of tribes throughout the nation and the United Way. The Little Traverse Bay Bands of Odawa Indians Human Services Department continues to collaborate with the local community and government as well as with the Michigan Department of Human Services on a local and statewide level. This consultation is across the board and consistent for the purpose of the delivery of child welfare services and covers all 422 provisions of the Social Security Act.

Early last year, Tribal Social Service Directors of Michigan have united to form a coalition called the Tribal Social Services Directors Coalition of Michigan. This group consists of eight of the twelve tribal directors in the state. Little Traverse Bay Bands is a member of this coalition. It is the goal of the coalition to meet with each other in order to present Indian child welfare issues in a manner that is united and consistent, demanding action within the state. This coalition has been instrumental in the development and implementation of the consultation agreements that some Tribes have already signed. Further, this coalition has united the tribes in presenting issues to the state and seems to be effective in eliciting responses from the state that promote the interests of Indian child welfare.

Stakeholders for Indian child welfare are varied and many. It is important to note that much child welfare work takes place at the local level without memorandums of understanding or agreements with the state at the top level ensuring cooperation. Much discussion with the Michigan DHS has centered on this issue at Tribal State Partnership meetings. As a result, a consultation agreement was drafted by the Tribal Social Services Coalition of Michigan (the newly formed coalition that includes 8 of 12 of MI federally recognized tribes). The consultation agreement outlines how communication and consultation is to occur between the state and the tribes regarding the issue of Indian child welfare. The Michigan Director of DHS, Maura Corrigan, has signed the agreement for the Little Traverse Bay Bands and the agreement is awaiting signature from the appropriate tribal officials. At this time, Little Traverse Bay Bands seems to be going through some tough political climate. These politics make it difficult for agreements and MOU's to be signed at this time. LTBB will be undergoing elections for new council members as well as another recall election for the tribal chair. It is hoped that the political climate will become more stable in the months to come.

Regarding agreements and MOU's, it was learned that LTBB has a very basic Title IV-E agreement that was signed in 1999. Further, another draft Title IV-E agreement was proposed to the state in December 2010. At this time, the agreement has been left in the hands of the state. It will continue to be followed up on until such time as there is an agreement that meets the needs of the tribal citizens that IV-E is required to serve. Details of a fiscal agreement still need to be worked out. The state officials have indicated their commitment in completing this agreement. It will be necessary for LTBB Human Services Department to continue to initiate the discussion about completion and resolution.

LTBB Human Services staff members continue to make referrals for determination for Medicaid and Social Security. Tribal social workers assist with applications and follow up on behalf of tribal clients in order that these clients have access to these services as citizens of this state and nation.

The Human Services Director continues to meet with local court systems, DHS offices within the 27 county service area, domestic violence programs, substance abuse treatment programs, Community Mental Health, homeless shelters, Head Start, commodities program and local schools to provide education about ICWA and tribal resources and laws as necessary. Referrals are made for services as appropriate when Tribal services are not available. It continues to be protocol to use tribal services first as they are culturally appropriate.

With regard to child support payments, the Tribe does occasionally receive child support for children who are in foster care ONLY. There are also issues with regard to child support and divorces in general as they relate to tribal laws. The Tribe does not have a child support unit or tribal law about support. This has been brought to the attention of the legislative branch of government. The Tribe relies on the enforcement of state court orders at the state level through Full Faith and Credit.

The LTBB Human Services Department works with the local court system to prevent out of home placement, provide intervention, educate regarding compliance with the Indian Child Welfare Act and provide tribally licensed foster homes. The director or a representative meets with Emmet County Probate and Family Court on an as needed basis. This is the only county in the service area where the Tribe currently has land in Federal trust and maintains historical reservation boundaries in which it asserts jurisdiction over its membership.

The LTBB Human Services Department works with the local county Department of Human Services (DHS) in investigating children protective services referrals, providing intervention and prevention services, assisting the DHS with providing active efforts, and monitoring compliance with the Indian Child Welfare Act. Tribal Social Workers accompany DHS case workers to investigate child protective service cases of known LTBB tribal citizens. This occurs consistently and regularly in the immediate service area of Charlevoix, Emmet, and Cheboygan County. It has been reported consistently that the state DHS has better outcomes with families when a tribal social worker accompanies them. The Director of the Charlevoix/Emmet County Department of Human Services changed this year with the wave of retirements in the state. However, the staff is committed to working very closely with LTBB to protect children and preserve families. The Director of Human Services for the Tribe continues to consult and meet with the county director or his designee at least monthly, sometimes weekly or daily depending on the situation. Case consultation is often and detailed. The working relationship really does make for better outcomes in dealing with families. It is hoped that these outcomes will be able to be documented and accounted for through the established database to be able to present hard data. Further, when the local DHS receives a protective services referral on a family that is known to be located on trust

land, the state turns over those referrals in their entirety, including previous protective service referral information to the LTBB Human Services Department for investigation.

The LTBB Human Services Department works with the state Department of Human Services, State Court Administrators Office and Department of Juvenile Justice on a quarterly basis at the Tribal State Partnership Meetings. The LTBB Director of Human Services consults and meets with these representatives or their designee for the purpose of networking, gathering information, and consultation. The quarterly meetings have previously been an issue of contention between tribes and the state. However, there has been a shift in power and influence at Tribal State Partner meetings through the implementation of the Tribal Social Services Directors Coalition of Michigan. The LTBB Director of Human Services co-chairs these meetings. Therefore, the LTBB Human Services Director has a great deal more contact with professionals on both sides outside of the quarterly meetings.

The LTBB Human Services Department provides leadership and oversight for the newly developed Family Services Coordinating Team. This team meets monthly to discuss compliance of case service plans and referrals for those cases that are under the jurisdiction of the LTBB Tribal Court. The Human Services Department has determined that these meetings were not very effective for the amount of time devoted to the meetings. Coordination for families takes place all of the time and not just at a regularly scheduled meeting time and place. Further, people and professionals involved do not want to have to sit to wait for their turn to discuss a family whose situation is already been taken care of. Therefore, the Family Services Coordinating Team meetings do not occur as outlined in the Child Protection Law. However, meetings occur more frequently and under the name of a Team Decision Making meeting. These meetings seem to be more helpful to the families. Changes in the Child Protection Code have been suggested and will be going to the LTBB Legal and Legislative Committee for review.

The LTBB Human Services is a member and attends monthly meetings of the Human Services Coordinating Body of Charlevoix and Emmet County. This is a body of all non-Indian stakeholders regarding child welfare and needs based services. Directors, administrators, judges, and program coordinators from the two county (Emmet and Charlevoix) area meet monthly to discuss what is available to address child welfare issues. This coordinating body is a multitude of experience and information in child welfare. Membership on this team is helpful for coordination and consultation with local people.

The LTBB Human Services Department includes families in the development of case service plans for the purpose of preventing out of home placement and the building and maintenance of safe and stable families. This is a requirement set forth from the Bureau of Indian Affairs. Parents meet with the social worker assigned to the case. Families assist in identifying goals and action steps toward prevention or early reunification. There are occasion when it is appropriate to include children and other family members in developing goals and action steps as well. The adults in the case

sign the case service plan and receive a copy. The social worker in the case then meets with the family or adults to monitor progress, address barriers and modify goals if necessary.

Currently, most programs at the local level are working to the benefit of tribal members without issue. As previously mentioned, for continuity of care and consistency, it is important that memorandums of understanding be forged at the local level. While this remains important and a priority to the LTBB Human Services Director, there are other political issues that take precedent for the Tribal Chairman and the Tribal Council.

### **Program Support and Training**

It was the goal of the LTBB Human Services Department to implement a standard training schedule for all LTBB social workers. Tribal social workers must have a minimum of a bachelor's degree in social work to be employed with the Tribe. The Tribe is a sovereign nation and responsible for setting its own standards with regard to training requirements. All Human Services staff that works with child welfare are now required to participate in annual training on the LTBB Child Protection Statute. This goal has been met for the past two years. This is important for the safety of our children because our Tribal statute outlines time frames, roles and responsibilities, jurisdiction, procedures, hearings, termination, permanency, etc. This training includes mandatory reporting requirements in our statute. Having staff properly trained in the law keeps children safe, provides for permanency and focuses on the well-being of children and their families.

A training regimen has been implemented that includes all social workers being trained annually on the Child Protection Code. Staff also receive an initial training on Human Services Basic and Intermediate Services and cross training of the Department when hired. Human Services staff who deal with child welfare are required to complete the online ICWA training and certification offered through NICWA as well as Forensic Interviewing training offered through the Prosecuting Attorneys Association of Michigan.

The Child Welfare Commission licenses foster homes for LTBB. The commission is responsible for developing and implementing regulations. Regulations require criminal background checks, fingerprints, Central Registry clearance through the state, medical clearances, personal references, and a thorough home study in order for a home to be licensed. The requirements follow PL-116 and the Good Moral Conduct Standard, as indicated for state licensed homes. In addition, the LTBB foster home regulations require compliance with federal regulations for working with Indian children.

The Human Services Director took the initiative to implement a new data collection system in the spring of 2009. Prior to this database, there were no electronic records, and no trend analysis. Training on data entry was provided to our staff, which began utilizing the system immediately. Additional training will be provided on the process to implement the newest version of the data system. This system will improve programs by allowing staff to spend more time providing direct client services, less time completing

paperwork, and more effective analysis of trends to determine intervention effectiveness.

It has been found that data base development and implementation has been difficult with regard to child welfare. Off the shelf programs still need to be tailored to the program that is using the system and they are very costly. To create one's own system, was time consuming. The goal with the data collection process as it matures is that there will be the capability to monitor and analyze trends in child welfare, such as sexual abuse, domestic violence, substance abuse, absent parents, etc. The Human Services Director will conduct data analyses annually to monitor trends. Areas of need will be identified according to the trends, training will be implemented to address the need. Technical assistance and program support from the National Resource Center for Data and Technology was very beneficial to assisting in the redevelopment of the data base system.

In the past, LTBB has received technical assistance from the National Resource Center for Legal and Judicial Matters. Conference calls were organized and coordinated regarding AFCARS requirements. The Director of Human Services and MIS Director participated in this call in an effort to make sure federal reporting requirements were met for Title IV-E. Our staff also participated in training on How to Be A Qualified Expert Witness in ICWA Court Cases. Each time that LTBB has used the NRC's it has been helpful and a positive experience. LTBB will be utilizing the National Resource Center for Tribes and In-Home Services for training tribal folks on implementation of Positive Indian Parenting. This training will occur at the end of August 2011.

Anticipated a future needs of the NRC's include, technical assistance to help improve our 5-year CFSP, including goal setting and monitoring and Title IV-E assistance with AFCARS and assistance with Qualified Expert Witness training.

The Five Year Child and Family Services Plan is available to the state for their review. A copy of this plan will be sent to the Director of Native American Affairs for the state of Michigan, Stacy Tadjerson.

### **Consultation with State**

The LTBB Human Services Department works with the State of Michigan for the purpose of consultation and delivery of child welfare services and compliance with ICWA. Even though ICWA was made a federal law in 1978, more than thirty years ago, there is still work to be done in education and compliance with ICWA. The Tribal State Partnership works to address these issues quarterly. Directors of child welfare from the (Michigan) tribal and state side meet together. Discussions about ICWA have included the following: notice of child welfare proceedings to Tribes, definition of active efforts, placement preferences, adoption issues, permanency issues, consistent determination of children that are Title IV-E eligible, codification of the Indian Child Welfare Act in the state and tribe's rights to intervene and request transfer of jurisdiction. Efforts are underway to make the Tribal State Partnership meetings more of consultation process.



Significant changes have occurred at these meetings with tribes demanding that they be considered a partner. A shift in the balance of power has occurred and the tribes are being taken more seriously.

A consultation agreement was drafted by the Tribal Social Services Directors Coalition of MI with assistance from the Casey Family Programs. Approximately half the tribes (5) who participate in the coalition have signed the consultation agreement. This was the top priority of the tribal group.

Other areas of concern with the state include not allowing meaningful input into programs and policy development that impact Native Americans. The discussion of the need for this input would save all stakeholders time and money in the long run. As of recently, the state has asked for feedback on several issues before implementation and roll out. However, there also continues to be some areas where this has not happened. It is currently a work in progress. However, the formation of the coalition has definitely impacted the way that business is conducted in the state with tribes and child welfare. There is still room for improvement. Currently the state has asked for feedback on the Centralized Intake Unit (for reporting child abuse), the Family Engagement Model (new model to elicit info from families to assist with case planning), SACSWS system changes, YIT and ETV referral processes, amongst other smaller issues.

The tribes have weighed on the training that is provided to new state child welfare workers as well as updates. The tribal partners indicated to the state that there needed to be changes to the state curriculum in order to adequately address relevant Indian child welfare issues. Essentially ICWA seemed to get lost in the presentation. While the state was very resistant to this feedback initially, it did generate discussion and some changes in the training.

There continues to be a significant disparity between MI DHS policy and ICWA. Further, front line staff are not fully educated or deal with ICWA often enough to navigate correctly. Front line staff often rely on policy books as opposed to the law. Some of MI DHS policy is antiquated and was developed before tribes had a meaningful presence politically. There has been a great deal of talk about the need for policy to be modified. This will continue to be an issue that arises so long as policy goes unchanged. Currently the State Court Administrators Office in Michigan is leading an initiative to implement the Michigan Indian Family Preservation Act which would codify the federal ICWA. If this gets a sponsor to proceed through the legislative process, it is likely that MI DHS policy will have to change to reflect the MI law.

The Tribe has exclusive jurisdiction of all Indians of issues occurring on trust land. The Tribe would be responsible for the care and supervision of Indian children where issues arise on trust land. If there are abuse neglect issues of a Tribal child on non-trust land, the Tribe would file intervention and determine whether or not to request transfer based on a multitude of factors including funding, care of the DHS providing case supervision, the Judge creating and implementing orders, cooperation of the state, available family

members for placement, available Tribally licensed homes, where the child is found (within service area or not), etc.

Child welfare is a comprehensive issue for states and tribes. Children are the responsibility of all those involved. It is the goal of the LTBB Human Services Department to provide culturally sensitive intervention when appropriate. However, it should be noted that tribal children also assume citizenship with the state and are encouraged to take advantage of the benefits that being a citizen of the county and state in which they live entitles them. In fact, BIA funding is residual and can only be used when there is no other funding available.

As in most child welfare service providing agencies, funding is a factor. There is just not enough free money (funding that does not require matching funds) to go around to provide for the care and supervision of children. Title IV-B does assist in filling some of the gaps and allowing the enhancement of services.

The Little Traverse Bay Bands of Odawa Indians pursued a development and implementation grant for the purpose of receiving Title IV-E funds directly from the federal government in the past. Since that time, LTBB Human Services met with NICWA to determine the feasibility of the Tribe seeking Title IV-E directly from the federal government. It was determined that at this time, based on the numbers, that seeking direct funding is not a viable. Therefore the LTBB Human Services Director has begun the discussion with the state again about entering into a fiscal agreement for IV-E. It was determined that there is a very basic IV-E agreement that was signed in 1999. However, no one seems to know if this agreement is still valid. In the meantime, the state prepared a draft agreement that was approved and signed by the LTBB Tribal council. Upon submission to the state, it was supposed to be signed by the previous Director of the MI Department of Human Services. However the agreement was never signed by the previous director, leaving the IV-E issue in limbo. The LTBB Director of Human Services has had many discussions with various folks from the state about implementing an agreement that allows LTBB to access funding in cases where the child is IV-E eligible. This remains an issue. While it seems that the State and the Tribe can come to an agreement, it may be beneficial if the federal government through the Department of Health and Human Services assist in order to move the process along.

### **Health Care Services**

The Little Traverse Bay Bands of Odawa Indians has its own Tribal Health Clinic. This clinic allows tribal members, descendents and those of other federally recognized tribes to seek medical care for no cost. This clinic is largely funded through Indian Health Services. This clinic, of course, still follows all of the applicable laws with regard to confidentiality. However, the LTBB Human Services Department has worked with the clinic staff to implement appropriate releases of information, the use of court orders and other Human Services Department forms to initially assess the medical needs the children coming in to care and review on a regular basis those children who remain in care. Part of the policy of Indian Health Services is to have ALL people apply and

receive verification of qualifying for Medicaid. ALL foster children in the state of Michigan are eligible for Medicaid. Human services staff obtain the necessary state forms and assist parents and foster parents in completing the form and returning it to MI DHS. The tribal health clinic works with the state Medicaid system and other insurance providers to insure that children in care get the attention that they need with regard to medical, dental and mental health needs. The clinic employs a full time doctor, two full time physician assistants and a part time pediatrician for the purpose of coordinating health care services for Native American's. The Tribe also has recently implemented mental health services. Therefore, if the doctor at the health clinic were to have concerns with regard to mental health, they make a referral to tribal mental health where the foster child can be assessed and care provided. Human Services Department staff also make direct referrals to mental health and substance abuse. This Tribe works with entities outside of the tribal community daily as well. There is a referral process that has been implemented and working well. The referral happens in writing or via telephone with written documentation. This allows for the needs of foster children and ALL Native Americans to get the comprehensive care that they need and deserve. Further, the LTBB Human Services Department has developed and implemented forms and checks and balances that account for the review of health, dental and mental health care of children in foster care through the last five year cycle of Title IV-B. Each child has the appropriate form in their case file for review.

With regard to a Health Care Services Plan, the Tribe has implemented a plan that allows the caseworker or foster parent to schedule appointments for foster children and take them for health care, dental and mental health services. The social workers or the foster parent make the call to schedule appointments. The program assists with transportation to appointments when necessary. The Tribal Court and Human Services Department have implemented a method in which care can be secured quickly and efficiently through an authorization form from Human Services. Human Services provides the form with authorization for care to the foster parents. Foster children coming into care need to have a complete physical and dental exam scheduled within thirty days. Social workers are responsible for making sure that physicals have occurred and are up to date. If a child is behind in their need for a physical, they will assist the foster parents in making sure that a physical happens. From there, exams happen as needed with a minimum of an annual well child exam. Health needs that are identified through the tribal health clinic are addressed through the clinic or referred out depending on the course of treatment. Referrals happen through phone calls from the tribal nurse to another practitioner or through a referral form depending on the care needed. Health care professionals through the Tribe monitor and request return visits as appropriate. The health clinic staff is provided with a court order that indicates the child is in foster care and that the Human Services Department is ultimately responsible for the care and supervision of the child. Identifying and health information is verified and updated each time a visit to the clinic occurs. The health clinic has its own database and electronic health record system that works effectively. Due to HIPPA Privacy laws, this information is not released without the proper documentation. Because the majority of the children who are in care through the Human Services Department are from this geographic location, continuity of care has not been an issue.

Prescriptions and co-pays are paid for through the Contract Health Services program of LTBB. Foster parents are explained the contract health process when and if it is necessary for foster children. When appropriate and necessary, tribal physicians consult with doctors within the general and specialized health care community. The part time pediatrician for the tribe is the Director of Community Health, formerly known as the community health department. Therefore, tribal doctors are surrounded by appropriate medical and non-medical professionals in assessing the health and well-being of children in foster care and in determining appropriate medical treatment. Children who are on psychotropic medications for the treatment of mental health issues are seen by the pediatrician. However, the pediatrician is a large proponent in referring these children to the local community mental health in order that they can receive consultation from a licensed child psychiatrist for the monitoring and prescribing of these medicines.

One of the requirements through the Bureau of Indian Affairs is to be certain the children in care have annual physicals. Case files are reviewed quarterly by the Human Services Director to monitor compliance. Case files are audited annually by the Bureau of Indian Affairs through Inter-Tribal Council of Michigan to monitor compliance. Initial and annual physical forms are completed by the physician a copy is kept at the physician's office, a copy is placed in the case file housed at the Human Services Department building and a copy is sent to Inter-Tribal Council of Michigan office in Sault Sainte Marie, MI.

About half of the foster care cases that Little Traverse Bay Bands provides oversight for are actually state cases. In these cases, the Tribe works directly with the MI Department of Human Services county offices to provide input for case service plans, education on the Indian Child Welfare Act, placement opportunities and referrals to culturally appropriate services. Each state case is assigned a tribal social worker who monitors and gives input according to the best interest of the tribal child. Each state worker is supposed to address the issue of comprehensive health care with youth that are aging out of the system. The Little Traverse Bay Bands of Odawa Indians Human Services Department works with the assigned state case worker to educate youth that they are not only tribal citizens, but citizens of the state and United States. These citizenships make them eligible for benefits that include health care coverage and health care services. It is the states responsibility to develop the Health Care Coordination Plan and provide health care information as part of the transition plan development process. Little Traverse Bay Bands of Odawa Indians works with the local Department of Human Service offices to provide information about what the Tribe has to offer for tribal citizens to be included in the transition plan. However, an overall MI Department of Human Services policy as it relates specifically to Native American children may be necessary to ensure that ALL workers follow through.

### **Disaster Plan**

A resolution was approved by the Little Traverse Bay Bands Tribal Council and was signed by the Tribal Chairman becoming effective as of 1/25/2006. This document is in

concert with the LTBB Emergency Preparedness Action Guidelines and the Emergency Disaster Plan. Each governmental department has a significant role to play in the event of any type disaster. The following are a list of individual department assignments that have been made to insure consistent action: Direction and Control, Damage Assessment, Communications, Health Department, Fire services, Human Services, Law Enforcement, Public Information, Facilities, and Warning Services. The combination of our strength to respond to emergency situations from within our organization and the ability to invite counties, state and federal assistance affords us the opportunity to provide swift and appropriate response for our tribal members. Neither LTBB Odawa, local municipalities, counties, nor the State of Michigan possesses all of the necessary resources to cope with every possible emergency or disaster by itself, and an effective, efficient response can best be achieved by the application and leveraging of the collective resources of local and federal agencies.

The Tribal Chairman may declare a **state of emergency** for affected LTBB Odawa lands and waters within the reservation if a disaster has occurred causing wide spread or severe damage, injury, or loss of life, or if an imminent threat thereof exists. The Tribal Chairman may declare a **state of emergency** in those situations where the Federal Government is required to supplement local efforts and capabilities to save lives, protect property, and tribal health and safety and to lessen or avert the threat of catastrophe. The Tribal Chairman may declare a **state of emergency** to obtain specialized local assistance through its Memorandum Of Understanding with Emmet County Emergency to meet specific needs of tribal members whom the local county is uniquely able to provide. The Tribal Chairman may also declare a **“heightened state of alert”** if he believes that members of a terrorist organization are within tribal lands and properties within the reservation or that the acts of terrorism may be committed within or against a vital resource on tribal properties. The Tribal Chairman may also declare a **“state of disaster”**. Upon declaring a state of disaster the Tribal Chairman may seek local assistance and financial assistance from the federal government for those areas in the declaration, including (if the situation warrants) requesting a Presidential emergency or major disaster declaration through FEMA. The Tribal Chairman’s declaration of a **“state of disaster”, “a state of emergency”, or a “heightened state of alert”**, activates the overall LTBB Odawa Emergency Plan, that includes local assistance through the Memorandum Of Understanding with Emmet County (MOU is attached to this document). The Tribal Chairman’s announcement of either **“a state of emergency”, a heightened state of alert” or a “state of emergency”**, will automatically activate the opening of the **“Emergency Management Center”**. This will begin the process of collecting intelligence; evaluating first responder reports; establishing incident command in accordance with situational circumstances; taking necessary measures to insure the life, safety and protection of properties; notifying key officials; conducting preliminary damage assessment; following Incident Command System (ICS) or, National Incident Command System (NIMS guidelines throughout the emergency process). The LTBB Human Services Director has been certified as trained through the NIMS training program in level 100 and 200.

The planning process for emergency disasters began on February 3, 2003, with the inception of a safety department, and creation of a facility/department specific emergency management plan that enacted the following training and accompanied procedures and practice drills that covered: a safety policy, fire awareness and evacuation, bomb threats, tornado, severe weather, earthquakes, flooding, protective equipment, blood borne pathogens, hazardous communications, heat and cold stress, medical and first aid, CPR, personal protective equipment, respiratory protection, homeland security planning, bio-terrorism awareness and pandemic flu awareness and preparation. Also implemented were the health and safety inspections of Tribal facilities and new employee safety training and refresher training. The plan has been expanded to include regarding the transportation emergency plan that includes safe transport of children and families. Vehicles have been supplied with first aid kits and personal protection equipment for the protection from hazardous materials. Staff is mandated to carry tribally issued cell phones. Further, Social Services staff have been trained through NIMS to provide assistance in hazardous spills, natural disasters and meth lab contamination. A meth lab/hazardous spill policy has been developed and implemented that outlines steps that should be taken when a report comes in. Annual training is provided to Social Services staff for basic employee safety.

Work has been done through the mandatory training provided to foster families about what to do in the event of a disaster. Foster parents have been instructed to take necessary documents like court orders with them in the event of a need to evacuate. Foster parents know that they can reach the Human Services Program through Little Traverse Bay Bands Law Enforcement Dispatch. Each foster parent received the preferred emergency procedures in reaching the Human Services Department in the event of an emergency. The Human Services Department has social work staff that rotate on call. Each social worker has been provided a file with emergency on call phone numbers for local resources. This file also includes a current case load list of children placed in care under the jurisdiction of Tribal Court and where they are placed. The list also includes information with regard to biological parents as well. In the event of a declared emergency, the on call staff person would contact the foster families to give further instructions as necessary. In the event of cell phones not working, there are back up plans that include media support through TV and radio.

The Tribal Administrator and Tribal Chairman are the only ones to release information to the public and media during a disaster. These two leaders within the tribal community would be solely responsible for releasing any and all information necessary for the safety of tribal people. The tribe employs a safety coordinator and an assistant safety coordinator who would take the lead in the event of a disaster and make arrangements for shelter and emergency food and health care. A reception center would be created for victims as well as missing person notification information. Depending on the disaster and what has been compromised or affected will determine where the center will be established. The location of the center will be disclosed through whatever means available and necessary including media, phones, door to door communications and public announcement means. The plan includes a reception center hotline and a means to provide for missing persons reports. The safety coordinator and the assistant

will also establish a method to contact hospitals and other shelters to obtain information on the people they are serving. Coordination with agencies in the community that work with special needs groups will have to happen to ensure these individuals' disaster related needs are met. Crisis counseling will take place as appropriate and be provided by the LTBB Mental Health/Substance Abuse Department. The Tribe will also partner with the local Community Mental Health and crisis counseling centers in the event of an overflow or of a disaster that is isolated to the tribe. As previously mentioned, food services will be activated for victims and disaster workers. Coordination with American Red Cross (ARC) and other pertinent organizations for the distribution of emergency clothing for disaster victims will be necessary. An area will be established as an appropriate and safe distance that provides for the collection and distribution of donated items such as clothing, food, personal items, etc. Efforts to coordinate transportation will occur to provide transportation for disaster victims. Consideration will be given to local school buses, county transit buses, Council on Aging, tribal transportation services etc. Mass transportation for disaster workers to the staging site of the disaster area will be arranged if necessary.

Volunteers are an essential part of large disaster plans. A registration center would be implemented to accommodate the need for volunteers to carry out appropriate responsibilities. Efforts will be coordinated with other members of the LTBB Emergency Operations Center to effectively utilize volunteers and/or respond to the needs of the volunteers. There will also be a means to establish and identify lost and found pets and domestic animals. Coordination will occur with tribal facilities for the purpose of securing safe drinking water and food supplies. The safety of Human Services staff is paramount in order to carry out responsibilities to the children and families of LTBB.

### **Plan Availability**

This plan will be available to all interested parties via the LTBB website at the following link: [www.ltbodawa-nsn.gov](http://www.ltbodawa-nsn.gov) under the heading of Human Services. A copy of the Annual Progress and Service Report will be e-mailed to the MI DHS Director of Native American Affairs. Hard copies of the plan will be available at the Human Services Department upon request.

### **Chafee Foster Care Independence and Education And Training Vouchers Programs**

Opportunities are offered through the state of Michigan. The Director of Native American Affairs has mentioned these opportunities and has offered contact information for these state programs through conversation and e-mail correspondence. The LTBB Human Services Department will follow the implemented state procedure for referrals by submitting an application to Lutheran Family Services that is the clearinghouse for Chafee and Education and Training Vouchers applications and referrals if and when there is an appropriate referral. Tribal applications and referrals are to be reviewed by the Director of Native American Affairs. In the last five years, there have been four tribal children that were eligible for Chafee and ETV. However, they declined to take

advantage of the programs. LTBB children are eligible for the Michigan Indian Tuition Waiver and various LTBB scholarships. Many tribal citizens do not want to use federal or state funds if Tribal funds are available because of the historical trauma from past relationships with the state and federal governments. They see the Michigan Indian Tuition Waiver as an entitlement and are therefore willing to accept the assistance.

The Little Traverse Bay Bands of Odawa Indians has discussed eligibility determination of Native American children who may be eligible for services through the Education and Training Vouchers and/or Chafee with the Department of Human Services and the Director of Native American Affairs. The current process to access ETV services and/or Chafee for LTBB children begins when the LTBB Human Services Director contacts Lutheran Family Services and the Director of Native American Affairs to submit an application. Determination is made according to state standards and guidelines. There has been further discussion at the state level about how to set aside money specifically for Native American referrals as opposed to including federally recognized tribal members with the non-Indian population. There has been no resolution to this as of yet.